## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

David William Wood,	)
Plaintiff,	)
v.	) Civil Action No.: 3:15CV594 (MHL)
EQUIFAX CREDIT INFORMATION	)
SERVICES, LLC; EXPERIAN	)
INFORMATION SOLUTIONS, INC.;	)
TRANS UNION, LLC;	)
CREDIT ONE BANK; and	)
MIDLAND CREDIT MANAGEMENT, INC.	)
	)

## DEFENDANT CREDIT ONE BANK, N.A.'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure the Defendant, Credit One Bank, N.A., by and through the undersigned counsel, moves for summary judgment. As detailed in the accompanying memorandum in support of this motion and reflected in the exhibits attached to it, there is no genuine dispute as to any fact material to Plaintiff's inability to prove all elements of each of the claims in his Complaint, and Defendant Credit One Bank is therefore entitled to judgment in its favor as a matter of law. Defendant respectfully requests that this Court grant summary judgment in its favor.

CREDIT ONE BANK, N.A. (m/n/a Credit One Bank)

By Counsel,

/s/

Lauren Cafferty Virginia State Bar No. 83712 McGuireWoods LLP 2001 K Street N.W., Suite 400 Washington, DC 20006-1040 202.857.1733 (Direct Line) 202.828.3332 (Fax) lcafferty@mcguirewoods.com

Christopher J. Sears (admitted *pro hac vice*) CIPRIANI & WERNER, PC 500 Lee Street, E., Suite 900 Charleston, WV 25301 (304) 341-0500 (t) (304) 341-0507 (f) csears@c-wlaw.com

Counsel for Credit One Bank, N.A.